

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,¹

Debtors.

OFFICIAL TORT CLAIMANTS'
COMMITTEE OF BOY SCOUTS OF
AMERICA AND DELAWARE BSA, LLC,

Plaintiff,

v.

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Defendants.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

Adv. Pro. No. 21-50032 (LSS)

NOTICE OF **AMENDED**² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MAY 19, 2021, AT 10:00 A.M. (ET)

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by May 15 at 8:30 a.m.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJIItc-GvqjouEqO4weFRRYL0XS9y2vCJ3vo>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.

Topic: Boy Scouts of America

Time: May 19, 2021, at 10:00 AM Eastern Time (US and Canada)

¹ The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

² **Amended items appear in bold.**

RESOLVED MATTER

1. Debtors' Fourth Motion for Entry of an Order Under 28 U.S.C. § 1425 and Fed. R. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief ([D.I. 2720](#), filed 4/28/21).

Objection Deadline: May 12, 2021, at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

- a) Certificate of No Objection Regarding Debtors' Fourth Motion for Entry of an Order Under 28 U.S.C. § 1425 and Fed. R. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief ([D.I. 3929](#), filed 5/13/21); and
- b) Fourth Order, Under 28 U.S.C. § 1425 and Fed. R. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief ([D.I. 3940](#), entered 5/14/21).

Status: An order has been entered, no hearing is necessary.

ADJOURNED MATTER

2. Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance ([D.I. 2719](#), filed 4/28/21).

Objection Deadline: May 12, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance ([D.I. 3781](#), filed 5/12/21);
- b) Joinder of the Future Claimants' Representative to the Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance ([D.I. 3851](#), 5/12/21); and
- c) Joinder and Statement of Support of the Coalition of Abused Scouts for Justice Regarding Objections to First Mediators' Report ([D.I. 3854](#), filed 5/12/21).

Related Pleadings: None.

Status: This matter is adjourned to June 17, 2021.

MATTERS GOING FORWARD

3. Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 2295](#), filed 3/2/21).

Objection Deadline: May 6, 2021, at 4:00 p.m. (ET); extended to May 10, 2021, at 4:00 p.m. (ET) for the Tort Claimants' Committee (the "[TCC](#)"), Coalition of Abused Scouts for Justice (the "[Coalition](#)") the Future Claimants' Representative ("[FCR](#)"), the Unsecured Creditors' Committee (the "[UCC](#)"), the Girl Scouts of America, USA, Liberty Mutual Insurance Company, Allianz Insurers, Clarendon, Zurich, and AIG; extended to May 10, 2021, at 5:15 p.m. (ET) for the U.S. Trustee; extended to May 12, 2021, for Century Indemnity Company.

Responses Received:

- a) Century and Hartford's Statement Regarding the Recently-Filed Plan of Organization and Pending Rule 2004 Motions (DKT. Nos. 1972, 1974) ([D.I. 2316](#), filed 3/4/21);
- b) Objection of Abuse Claimant 242 to the Disclosure Statement and Plan ([D.I. 2386](#), filed 3/16/21);
- c) Letter Regarding Sexual Abuse Claim Research ([D.I. 2398](#), filed 3/17/21);
- d) Objection of Various Claimants as to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 2449](#), filed 3/24/21);
- e) Letter Regarding Objections to Joinder/Notice of Related Cases ([D.I. 2470](#), filed 3/29/21);
- f) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization and Joinder ([D.I. 2497](#), filed 3/31/21);
- g) Letter Regarding Pro Se Complainant's Motion in Support of the Tort Claimants' Committee's Case Status Report ([D.I. 2533](#), filed 4/5/21);
- h) Request for the BSA to Add Money Amounts in the Disclosure Statement Before Its Approved ([D.I. 2576](#), filed 4/12/21);

- i) Objection to the Adequacy of Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 2585](#), filed 4/13/21);
- j) Objection to the Adequacy of Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 2586](#), filed 4/13/21);
- k) Letter Regarding Disclosure Statement Hearing ([D.I. 2625](#), filed 4/16/21);
- l) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 2642](#), filed 4/20/21);
- m) [SEALED] Objection to Disclosure Statement (D.I. 2666, filed 4/22/21);
- n) [REDACTED] Objection to Disclosure Statement ([D.I. 2667](#), filed 4/22/21);
- o) [SEALED] Letter Regarding Abuse (D.I. 2669, filed 4/22/21);
- p) [REDACTED] Letter Regarding Abuse ([D.I. 2670](#), filed 4/22/21);
- q) [SEALED] Objection to Disclosure Statement (D.I. 2692, filed 4/26/21);
- r) [REDACTED] Objection to Disclosure Statement ([D.I. 2693](#), filed 4/26/21);
- s) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 2739](#), filed 4/30/21);
- t) Objection to the Adequacy of Debtors' Second Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 2741](#), filed 4/30/21);
- u) Objection to the Adequacy of Debtors' Second Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 2845](#), filed 5/4/21);
- v) Objection to the Adequacy of Debtors' Second Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 2902](#), filed 5/4/21);
- w) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimant's Committee ([D.I. 2959](#), filed 5/4/21);
- x) Objection of Edward Marcelino, George Burgos, William F. Tompkins III, and Richard G. Dunn to the Debtors' Amended Disclosure Statement and Joinder in the Objection of the Committee of Unsecured Creditors, the Objection of the Committee of Tort Claimants, and Other Objections ([D.I. 2960](#), filed 5/4/21);

- y) Objection to the Adequacy of Debtors' Disclosure Statement in Support of The Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3150](#), filed 5/5/21);
- z) Objection to the Adequacy of Debtors' Disclosure Statement in Support of The Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3151](#), filed 5/5/21);
- aa) Objection to the Adequacy of Debtors' Disclosure Statement in Support of The Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3153](#), filed 5/5/21);
- bb) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3154](#), filed 5/5/21);
- cc) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3155](#), filed 5/5/21);
- dd) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3156](#), filed 5/5/21);
- ee) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3157](#), filed 5/5/21);
- ff) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3158](#), filed 5/5/21);
- gg) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3159](#), filed 5/5/21);
- hh) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3160](#), filed 5/5/21);
- ii) Objection of Certain Claimant to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of Objection of Tort Claimants' Committee ([D.I. 3162](#), filed 5/6/21);
- jj) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3163](#), filed 5/6/21);

- kk) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3164](#), filed 5/6/21);
- ll) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3165](#), filed 5/6/21);
- mm) Objection of Claimant SA-105992, SA-71204 to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 plan of Reorganization and Joinder to the Objection of the Tort Claimants' Committee ([D.I. 3167](#), filed 5/6/21);
- nn) Objection of Abuse Claimants to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3175](#), filed 5/6/21);
- oo) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3176](#), filed 5/6/21);
- pp) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3177](#), filed 5/6/21);
- qq) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3178](#), filed 5/6/21);
- rr) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3181](#), filed 5/6/21);
- ss) Herman Law Claimants' Joinder in the Objection of the Tort Claimants' Committee and Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America ([D.I. 3182](#), filed 5/6/21);
- tt) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3183](#), filed 5/6/21);
- uu) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3193](#), filed 5/6/21);

- vv) Merson Law, PLLC Claimants' Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3194](#), filed 5/6/21);
- ww) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3198](#), filed 5/6/21);
- xx) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3205](#), filed 5/6/21);
- yy) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3207](#), filed 5/6/21);
- zz) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3211](#), filed 5/6/21);
- aaa) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3214](#), filed 5/6/21);
- bbb) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3219](#), filed 5/6/21);
- ccc) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3222](#), filed 5/6/21);
- ddd) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3225](#), filed 5/6/21);
- eee) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3226](#), filed 5/6/21);
- fff) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3231](#), filed 5/6/21);
- ggg) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3236](#), filed 5/6/21);

- hhh) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3243](#), filed 5/6/21);
- iii) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3247](#), filed 5/6/21);
- jjj) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3249](#), filed 5/6/21);
- kkk) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3251](#), filed 5/6/21);
- lll) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3252](#), filed 5/6/21);
- mmm) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3253](#), filed 5/6/21);
- nnn) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3254](#), filed 5/6/21);
- ooo) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3255](#), filed 5/6/21);
- ppp) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3256](#), filed 5/6/21);
- qqq) Claimant Paul Baumann's Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3257](#), filed 5/6/21);
- rrr) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3258](#), filed 5/6/21);
- sss) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3260](#), filed 5/6/21);

- ttt) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3261](#), filed 5/6/21);
- uuu) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3262](#), filed 5/6/21);
- vvv) [REDACTED VERSION] Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 3263](#), filed 5/6/21);
- www) Ronald Hernandez Hunter's Objection to the Adequacy of Debtors Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3264](#), filed 5/6/21);
- xxx) PCVA Claimants' Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 3265](#), filed 5/6/21);
- yyy) [SEALED] Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief (D.I. 3266, filed 5/6/21);
- zzz) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3267](#), filed 5/6/21);
- aaaa) Objection to the Debtors' Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC and Joinder in the Objection of the Tort Claimants' Committee ([D.I. 3268](#), filed 5/6/21);
- bbbb) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder ([D.I. 3269](#), filed 5/6/21);
- cccc) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 3270](#), filed 5/6/21);

- dddd) Great American's Objection to Debtors' Disclosure Statement for Second Amended Chapter 11 Plan of Reorganization and Joinder ([D.I. 3271](#), filed 5/6/21);
- eeee) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization ([D.I. 3272](#), filed 5/6/21);
- ffff) Objection of the United Methodist Ad Hoc Committee to the Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 3273](#), filed 5/6/21);
- gggg) Joinder by AWKO's Claimants to the Objection to the Adequacy of the Debtors' Disclosure Statement by the Tort Claimants' Committee ([D.I. 3274](#), filed 5/6/21);
- hhhh) Objection of Gibbs Law Group LLP on Behalf of Claimants L.S. (Claim No. SA-71855), K.P. (Claim No. SA-66172), and E.K. (Claim No. SA-78274) to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3275](#), filed 5/6/21);
- iiii) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3276](#), filed 5/6/21);
- jjjj) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3277](#), filed 5/6/21);
- kkkk) Joinder by Travelers Casualty and Surety Company, Inc. (FKA AETNA Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Great American's Objection to Debtors' Disclosure Statement for Second Amended Chapter 11 Plan of Reorganization and Joinder ([D.I. 3278](#), filed 5/6/21);
- llll) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3279](#), filed 5/6/21);
- mmmm) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3281](#), filed 5/6/21);
- nnnn) Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee and of Claimant 45448 ([D.I. 3282](#), filed 5/6/21);
- oooo) Objection to Debtors' Disclosure Statement: Eight Questions ([D.I. 3284](#), filed 5/6/21);

- pppp) Argonaut Insurance Company's Objection to Debtors' Disclosure Statement for Second Amended Chapter 11 Plan or Reorganization and Joinder ([D.I. 3285](#), 5/6/21);
- qqqq) Amended Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3309](#), filed 5/7/21);
- rrrr) Objection to the to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3424](#), filed 5/10/21);
- ssss) Zurich Insurers' Objections to the Disclosure Statement for Debtors' Second Amended Plan ([D.I. 3478](#), filed 5/10/21);
- tttt) The AIG Companies' Objection to Motion for Approval of Debtors' Disclosure Statement ([D.I. 3523](#), filed 5/10/21);
- uuuu) Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 3526](#), filed 5/10/21);
- vvvv) The Allianz Insurers' (I) Objection to the Debtors' Disclosure Statement for Their Second Amended Chapter 11 Plan of Reorganization and (II) Limited Joinder of Certain Objections ([D.I. 3549](#), filed 5/10/21);
- www) Joinder of Clarendon National Insurance Company, as Successor by Merger to Clarendon American Insurance Company, in Certain Insurers' Objection to the Proposed Disclosure Statement for Debtors' Second Amended Plan and Debtors' Proposed Confirmation Schedule ([D.I. 3558](#), filed 5/10/21);
- xxxx) Objection of the Future Claimants' Representative to (A) Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC and (B) Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 3565](#), filed 5/10/21);

- yyyy) Objection of the Coalition of Abused Scouts for Justice to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, (VI) Granting Related Relief [D.I. 2295] ([D.I. 3569](#), filed 5/10/21);

- zzzz) Objection of Liberty Mutual Insurance Company to the Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 3578](#), filed 5/10/21);

- aaaa) Girl Scouts of the United States of America's Objection to Debtors' Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 3579](#), filed 5/10/21);

- bbbb) United States Trustee's Objection to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief (D.E. 2295) ([D.I. 3581](#), filed 5/10/21);

- cccc) Joinder of Continental Insurance Company to Certain Insurers' Objections to the Adequacy of the Disclosure Statement ([D.I. 3582](#), filed 5/10/21);

- dddd) Objection of Certain Claimant as to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 2500](#), filed 4/1/21);

- eeee) Objection to the Adequacy of Debtors' Disclosure statement in Support of Amended Chapter 11 Plan of Reorganization ([D.I. 2580](#), filed 4/13/21);

- ffff) Joinder of General Star Indemnity Company to the Allianz Insurers' (I) Objection to the Debtors' Disclosure Statement for Their Second Amended Chapter 11 Plan of Reorganization and (II) Limited Joinder to Certain Objections ([D.I. 3740](#), filed 5/12/21);

- gggg) Joinder to Objection of the Church of Jesus Christ of Latter-Day Saints, A Utah Corporation Sole, to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 3853](#), filed 5/12/21);

- hhhhh) Century Indemnity Company's Objections to the Debtors' Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization ([D.I. 3856](#), filed 5/12/21);
- iiii) Century Indemnity Company's Objections to the Debtors' Solicitation Procedures and Form of Ballots ([D.I. 3857](#), filed 5/12/21);
- jjjj) Notice of Filing of Exhibit A to Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee ([D.I. 3949](#), filed 5/14/21);
- kkkkk) Joinder of Arrowood Indemnity Company to Century Indemnity Company's Objections to the Debtors' Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization ([D.I. 4065](#), filed 5/14/21);
- lllll) Joinder of the Roman Catholic Archbishop of Los Angeles, a Corporation Sole, and Its Related BSA-Chartered Organizations to the Disclosure Statement Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole ([D.I. 3263] ([D.I. 4092](#), filed 5/14/21);
- mmmmm) **[SEALED] Objection to the Debtors' Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization (D.I. 4152, filed 5/17/21);**
- nnnnn) **Objection to the Adequacy of Debtors' Disclosure Statement in Debtors' Second Amended Chapter 11 Plan of Reorganization ([D.I. 4154](#), filed 5/17/21); and**
- ooooo) **Joinder of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Objection Tort Claimants' Committee ([D.I. 4321](#), filed 5/17/21).**

Related Pleadings:

- a) Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 2293](#), Filed 3/1/21);
- b) Disclosure Statement for the Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 2294](#), Filed 3/1/21);
- c) Notice of Status Conference ([D.I. 2448](#), filed 3/24/21);
- d) Amended Notice of Hearing to Consider Approval of Disclosure Statement and Solicitation Procedures for the Second Amended Chapter 11 Plan of Reorganization for Boys Scouts of America and Delaware BSA, LLC ([D.I. 2591](#), filed 4/13/21);
- e) Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 2592](#), filed 4/13/21);

- f) Amended Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 2594](#), filed 4/14/21);
- g) Notice of Filing of Redlines of Plan and Disclosure Statement, Trust Distribution Procedures, and Settlement Trust Agreement ([D.I. 2595](#), filed 4/14/21);
- h) Notice of Revised Solicitation Procedures Order ([D.I. 2726](#), filed 4/29/21);
- i) Notice of Witness Information in Connection with Matters Going Forward for May 19, 2021 Hearing ([D.I. 4093](#), filed 5/14/21);
- j) Statement of the Ad Hoc Committee of Local Councils in Support of Amended Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 4103](#), filed 5/16/21);
- k) Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving the Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 4105](#), filed 5/16/21);
- l) Proposed Amendments to Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 4107](#), filed 5/16/21);
- m) Proposed Amendments to Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 4108](#), filed 5/16/21);
- n) Notice of Filing of Redlines of Proposed Amendments to Plan and Disclosure Statement ([D.I. 4109](#), filed 5/16/21); and
- o) Notice of Filing of Revised Proposed Solicitation Procedures Order ([D.I. 4112](#), filed 5/16/21).

Status: This matter is going forward. Century Indemnity Company will have Paul Hinton, David McKnight, and Robert Vanderbeek available to testify as witnesses.

4. Motion of the Official Tort Claimants' Committee and Future Claimants' Representative for Entry of an Order Granting Standing and Authorizing the Prosecution of Certain Challenge Claims on Behalf of the Bankruptcy Estates ([D.I. 2364](#), filed 3/12/21).

Objection Deadline: March 26, 2021, at 4:00 p.m. (ET), extended to April 29, 2021, for the Debtors and JPMorgan Chase Bank, N.A.

Responses Received:

- a) JPMorgan Chase Bank, National Association's Objection to Joint Motion of the Official Tort Claimants' Committee and Future Claimants' Representative for Entry of an Order Granting Standing and Authorizing the Prosecution of Certain Challenge Claims on Behalf of the Bankruptcy Estates ([D.I. 2732](#), filed 4/29/21); and
- b) Debtors' Objection to Joint Motion of the Official Tort Claimants' Committee and Future Claimants' Representative for Entry of an Order Granting Standing and Authorizing the Prosecution of Certain Challenge Claims on Behalf of the Bankruptcy Estates ([D.I. 2733](#), filed 4/29/21).

Related Pleadings:

- a) Re-Notice of Joint Motion of the Official Tort Claimants' Committee and Future Claimants' Representative for Entry of an Order Granting Standing and Authorizing the Prosecution of Certain Challenge Claims on Behalf of the Bankruptcy Estates ([D.I. 2445](#), filed 3/24/21);
- b) Response and Limited Joinder of the Creditors' Committee to the Debtors' Objection to Joint Motion of the Official Tort Claimants' Committee and Future Claimants' Representative for Entry of an Order Granting Standing and Authorizing the Prosecution of Certain Challenge Claims on Behalf of the Bankruptcy Estates ([D.I. 2737](#), filed 4/29/21); and
- c) Omnibus Reply in Support of Joint Motion of the Official Tort Claimants' Committee and Future Claimants' Representative for Entry of an Order Granting Standing and Authorizing the Prosecution of Certain Challenge Claims on Behalf of the Bankruptcy Estates ([D.I. 4079](#), filed 5/14/21).

Status: This matter is going forward.

- 5. Motion of the Future Claimants' Representative, The Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings ([D.I. 2391](#), filed 3/16/21)

Objection Deadline: April 15, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Objection of the Church of Jesus Chris of Latter-Day Saints, a Utah Corporation Sole, to Motion of the Future Claimants' Representative, The Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings ([D.I. 2610](#), filed 4/15/21);
- b) Debtors' Objection to the Motion of the Future Claimants' Representative, The Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings ([D.I. 2612](#), filed 4/15/21);
- c) Old Republic Insurance Company's Objection to Motion of the FCR, TCC and Coalition to Estimate Current and Future Abuse Claims and Partial Joinder in Opposition of Certain Insurers to the Motion ([D.I. 2613](#), filed 4/15/21);
- d) Century's Opposition to the Coalition, TCC and FCR's Motion to Estimate Current and Future Abuse Claims ([D.I. 2614](#), filed 4/15/21);
- e) Joinder of the United Methodist Ad Hoc Committee to the Objection of the Church of Jesus Chris of Latter-Day Saints, a Utah Corporation Sole, to Motion of the Future Claimants' Representative, The Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings ([D.I. 2681](#), filed 4/23/21); **and**
- f) **Opposition of Certain Insurers to Motion of the Coalition, TCC and FCR to Estimate Current and Future Abuse Claims** ([D.I. 2611](#), filed 4/15/21).

Related Pleadings:

- a) Notice of Hearing on Motion of the Future Claimants' Representative, The Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings ([D.I. 2475](#), filed 3/29/21); and

- b) Omnibus Reply of the Official Committee of Tort Claimants, the Coalition of Abused Scouts for Justice, and the Future Claimants' Representative to Objections to Motion of the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings ([D.I. 4089](#), filed 5/14/21).

Status: This matter is going forward.

- 6. Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 2411](#), filed 3/18/21).

Objection Deadline: April 1, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) The Official Committee of Tort Claimants' Objection to Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 2506](#), filed 4/1/21);
- b) [SEALED] Objection of the Coalition of Abused Scouts for Justice and Future Claimants' Representative to Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof (D.I. 2668, Filed 4/22/21); and
- c) Notice of Filing of Final Redacted Version of Objection of the Coalition of Abused Scouts for Justice and Future Claimants' Representative to Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof (D.I. [2672](#), Filed 4/22/21).

Related Pleadings:

- a) Debtors' Motion for Leave to File Debtors' Reply in Support of Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 2577](#), filed 4/12/2021);
- b) Debtors' Reply in Further Support of Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 4100](#), filed 5/16/21);
- c) Declaration of Brian Whittman in Support of Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 4101](#), filed 5/16/21); and
- d) Hartford's Statement in Support of the Debtors' Motion to Extend the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 4115](#), filed 5/17/21).

Status: This matter is going forward. The Debtors intend to call Brian Whittman to testify as a witness in support of this matter. **Unless otherwise directed by the Court, the Debtors intend to proceed with the Exclusivity Motion first at the request of numerous parties.**

7. Debtors' Motion For Entry of Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 2618](#), filed 4/15/21).

Objection Deadline: May 12, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Limited Objection of the AIG Companies to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Procedures and, (III) Granting Related Relief ([D.I. 3708](#), filed 5/12/21);
- b) Zurich Insurers' Objections to Debtors' Proposed Confirmation Schedule ([D.I. 3747](#), filed 5/12/21);
- c) The Allianz Insurers' Joinder to the Limited Objection of the AIG Companies to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Procedures and, (III) Granting Related Relief ([D.I. 3771](#), filed 5/12/21);
- d) Joinder of Clarendon National Insurance Company, as Successor by Merger to Clarendon America Insurance Company, In the Limited Objection of the AIG Companies to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 3739](#), filed 5/12/21);
- e) Response of Liberty Mutual Insurance Company to the Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief and Limited Joinder ([D.I. 3794](#), filed 5/12/21);
- f) Great American's Objection and Joinder in Objections to Debtors' Motion for Entry of Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 3799](#), filed 5/12/21);

- g) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company to Limited Objection of the AIG Companies to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 3806](#), filed 5/12/21);
- h) Objection of the Official Committee of Tort Claimants, the Coalition of Abused Scouts for Justice, and the Future Claimants' Representative to the Debtors' Motion for Entry of Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 3816](#), filed 5/12/21);
- i) Joinder of Continental Insurance Company to Certain Insurers' Objections to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 3855](#), filed 5/12/21);
- j) Certain Insurers' Opposition to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 3859](#), filed 5/12/21); and
- k) Joinder of General Star Indemnity Company to Limited Objection of the AIG Companies to Debtors' Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Procedures and, (III) Granting Related Relief ([D.I. 3928](#), 5/13/21).

Related Pleadings:

- a) Amended Notice of Hearing of the Debtors' Motion For Entry of Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 2655](#), filed 4/21/21); and
- b) Debtors' Omnibus Reply to Objection to Motion For Entry of Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief ([D.I. 4104](#), filed 5/16/21).

Status: This matter is going forward.

- 8. Century's Motion to Amend the Court's Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief (Dkt. No. 341) ([D.I. 3161](#), filed 5/5/21).

Objection Deadline: May 12, 2021, at 4:00 p.m. (ET), extended to May 14, 2021, for the Debtors.

Responses Received:

- a) Response of the Tort Claimants' Committee to Century's Motion to Amend the Court's Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief ([D.I. 3775](#), filed 5/12/21); and
- b) Debtors' Response to Century's Motion to Amend the Court's Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief (Dkt. No. 341) ([D.I. 4094](#), filed 5/14/21).

Related Pleadings:

- a) Declaration of Stamatios Stamoulis ([D.I. 3286](#), filed 5/6/21); and
- b) Century's Submission of Proposed Order in Further Support of its Motion to Amend the Court's Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief (Dkt. No. 341) ([D.I. 4113](#), filed 5/17/21).

Status: This matter is going forward.

- 9. Motion of The Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Seal the Objection of The Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Form of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 3283](#), filed 5/6/21).

Objection Deadline: At the May 19, 2021, hearing.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

10. Motion for Leave to Exceed Page Limit Requirement for Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection With Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 3529](#), filed 5/10/21).

Objection Deadline: At the May 19, 2021, hearing.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

11. Motion for Leave to Exceed Page Limit Requirement for (i) Objection of Century Indemnity Company to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief and (ii) Century Indemnity Company's Objections to the Debtors' Solicitation Procedures and Form of Ballots ([D.I. 3858](#), filed 5/12/21).

Objection Deadline: At the May 19, 2021, hearing.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

12. Motion for Leave to Exceed Page Limitations Regarding Debtors' Reply in Further Support of Debtors' Third Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof ([D.I. 4102](#), filed 5/16/21).

Objection Deadline: At the May 19, 2021, hearing.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

13. Motion for Leave to Exceed Page Limitations Regarding Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving the Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief ([D.I. 4111](#), filed 5/16/21).

Objection Deadline: At the May 19, 2021, hearing.

Responses Received:

- a) Century's Response to Debtor's Motion for Leave [DKT. NO. 4111] ([D.I. 4114](#), filed 5/17/21).

Related Pleadings: None.

Status: This matter is going forward.

ADDITIONAL ADJOURNED MATTERS:

14. **Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting and Kosnoff Law PLLC to Submit Rule 2019 Disclosures ([D.I. 2028](#), Filed 2/3/21).**

Objection Deadline: February 10, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) **Kosnoff Law's Omnibus Objection to Hartford's and Century's Motions to Compel ([D.I. 2142](#), Filed 2/10/21); and**
- b) **Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C.'s Omnibus Response to (I) Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting And Kosnoff Law PLLC to Submit Rule 2019 Disclosures and (II) Century's Motion to Compel Abused in Scouting, Kosnoff Law PLLC, and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2143](#), Filed 2/10/21).**

Related Pleadings:

- a) **Reply in Support of Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting and Kosnoff Law PLLC to Submit Rule 2019 Disclosures ([D.I. 2170](#), Filed 2/11/21); and**

- b) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Hartford's Motion to Compel Abused in Scouting and Kosnoff Law PLLC to Submit Rule 2019 Disclosures ([D.I. 2181](#), Filed 2/11/21).

Status: At the direction of the Court, this matter is adjourned to a date to be determined.

- 15. Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2029](#), Filed 2/3/21).

Objection Deadline: February 10, 2021, at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

- a) Joinder by Agricultural Insurance Company to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2132](#), Filed 2/10/21);
- b) Joinder, Response and Objection to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2144](#), Filed 2/10/21);
- c) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2182](#), Filed 2/11/21);
- d) Century's Reply in Support of Its Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2198](#), Filed 2/15/21); and
- e) Corrected Response to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2208](#), Filed 2/12/21).

Status: At the direction of the Court, this matter is adjourned to a date to be determined.

16. Century's Motion to Compel Abused In Scouting, Kosnoff Law PLLC, and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2030](#), Filed 2/3/21).

Objection Deadline: February 10, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Limited Objection of the Coalition of Abused Scouts for Justice to Century's Motion to Compel [D.I. 2030] ([D.I. 2135](#), Filed 2/10/21);
- b) Kosnoff Law's Omnibus Objection to Hartford's and Century's Motions to Compel ([D.I. 2142](#), Filed 2/10/21); and
- c) Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C.'s Omnibus Response to (I) Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting And Kosnoff Law PLLC to Submit Rule 2019 Disclosures and (II) Century's Motion to Compel Abused in Scouting, Kosnoff Law PLLC, and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2143](#), Filed 2/10/21).

Related Pleadings:

- a) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Century's Motion to Compel Abused in Scouting and Kosnoff Law PLLC and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2183](#), Filed 2/11/21).

Status: At the direction of the Court, this matter is adjourned to a date to be determined.

ADVERSARY PROCEEDING – PRETRIAL CONFERENCE

Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA, LLC, v. Boy Scouts of America and Delaware BSA, LLC, Adv. Pro. No. 21-50032 (LSS)

Related Pleadings:

- a) Complaint for Declaratory Judgment ([A.D.I. 1](#), filed 1/8/21);
- b) The Debtors' Answer to the Tort Claimants' Committee's Complaint for Declaratory Judgment ([A.D.I. 16](#), filed 4/23/21);
- c) Notice of Rescheduled Pretrial Conference ([A.D.I. 9](#), filed 4/2/21);

- d) Certification of Counsel Regarding Proposed Scheduling Order ([A.D.I. 21](#), filed 5/14/21); **and**
- e) **Certification of Counsel Regarding Debtors' Proposed Scheduling Order ([D.I. 24](#), filed 5/17/21).**

Status: This matter is going forward as a pretrial conference.

FEE APPLICATIONS

- 17. Fourth Interim Fee Application Period Hearing.

Status: This matter has been adjourned to June 17, 2021, at 10:00 a.m. (ET).

Dated: May 17, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Eric W. Moats

Derek C. Abbott (No. 3376)
Andrew R. Remming (No. 5120)
Eric W. Moats (No. 6441)
Paige N. Topper (No. 6470)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Email: dabbott@morrisnichols.com
aremming@morrisnichols.com
emoats@morrisnichols.com
ptopper@morrisnichols.com

– and –

WHITE & CASE LLP

Jessica C. Lauria (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Email: jessica.lauria@whitecase.com

– and –

WHITE & CASE LLP

Michael C. Andolina (admitted *pro hac vice*)
Matthew E. Linder (admitted *pro hac vice*)
Laura E. Baccash (admitted *pro hac vice*)
Blair M. Warner (admitted *pro hac vice*)
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: mandolina@whitecase.com
mlinder@whitecase.com
laura.baccash@whitecase.com
blair.warner@whitecase.com

**ATTORNEYS FOR THE DEBTORS AND
DEBTORS IN POSSESSION**